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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GUILLERMO GONZALEZ-RANGEL )  
 )  
Defendant. )  
\_\_\_\_\_ )  
 )

No. 06-0782 PJH

STIPULATION AND ~~[PROPOSED]~~  
ORDER EXCLUDING TIME

SAN FRANCISCO VENUE

On December 21, 2006, the parties in this case appeared before the Court for a Trial Setting/Change of Plea Hearing. At that time, the parties stipulated that time should be excluded from the Speedy Trial Act calculations from December 21, 2006, through January 17, 2007, for effective preparation of defense counsel, in that defense counsel required time to review discovery and to confer with an immigration consultant. The parties represented that granting the continuance was the reasonable time necessary for effective preparation of both defense counsel and the United States, taking into account

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the exercise of due diligence. See 18 U.S.C. §3161(h)(8)(B)(iv). The parties also agreed that the end of justice served by granting such a continuance outweighed the best interests of the public and the defendant in a speedy trial. See 18 U.S.C. §3161(h)(8)(A).

**IT IS SO STIPULATED.**

Respectfully submitted,

KEVIN V. RYAN  
United States Attorney

DATED: 12/21/06

/s/ Tamara Weber  
TAMARA WEBER  
Special Assistant United States Attorney

DATED: 12/21/06

/s/ Geoffrey Hansen  
GEOFFREY HANSEN  
Attorney for Defendant Guillermo Gonzalez-Rangel

As the Court found on December 21, 2006, and for the reasons stated above, the Court finds that an exclusion of time between December 21, 2006, through January 17, 2007, is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. See 18 U.S.C. §3161 (h)(8)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

**IT IS SO ORDERED.**

DATED: 12/22/06

